

Baker & Hostetler LLP

45 Rockefeller Plaza

New York, New York 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Keith R. Murphy

Jonathan B. New

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

STEVEN B. MENDELOW, NANCY
MENDELOW, CARA MENDELOW, PAMELA
CHRISTIAN, C&P ASSOCIATES, LTD., and
C&P ASSOCIATES, INC.,

Defendants.

Adv. Pro. No. 10-04283 (BRL)

STIPULATION EXTENDING TIME TO RESPOND AND ADJOURNING
PRE-TRIAL CONFERENCE

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the date before which the above-captioned Defendants (individually and collectively, the “Defendants”) may move, answer or otherwise respond to the complaint (the “Complaint”) filed in the above-captioned adversary proceeding is extended up to and including September 14, 2012. The pre-trial conference shall be adjourned to September 20, 2012 at 10:00 a.m.

The purpose of this stipulated extension is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this stipulation is a waiver of the Defendants’ right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee’s right to object to any such request.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

Undersigned counsel for the Defendants: (i) expressly represents that, in accordance with Rule 7025 of the Federal Rules of Bankruptcy Procedure, a statement noting the death of all deceased Defendants (if any) has been served upon the Trustee, and (ii) expressly agrees to notify the Trustee of the death of any Defendant within five business days of the date upon which counsel first learns of such Defendant’s passing.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental

Authority To Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences
(ECF No. 4662) in the above-captioned case (No. 08-01789 (BRL)).

Dated as of: July 30, 2012

BAKER & HOSTETLER LLP

ARKIN KAPLAN RICE LLP

By: /s/ Jonathan B. New
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Keith R. Murphy
Email: kmurphy@bakerlaw.com
Jonathan B. New
Email: jnew@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard,
Trustee for the Liquidation of Bernard L.
Madoff Investment Securities LLC*

By: /s/ Michelle A. Rice
590 Madison Avenue
Thirty Fifth Floor
New York, New York 10022
Telephone: 212.333.0200
Facsimile: 212.333.2350
Michelle A. Rice
Email: mrice@arkin-law.com

*Attorneys for Defendants Steven B. Mendelow,
Nancy Mendelow, Cara Mendelow, Pamela
Christian, C&P Associates, Ltd., and C&P
Associates, Inc.*